

REMARKS

Claims 1-25 were pending in the application and were rejected. Claims 16-17 have been cancelled. Claims 1, 5, 21, and 25 have been amended. New claims 26-34 have been added. No new matter has been added. Reconsideration of the rejected claims is respectfully requested in view of these amendments and the following remarks.

**1. Response to Rejections under Section 103**

Claims 1-15 and 18-25 were rejected under 35 U.S.C. 103(a) as being unpatentable over Fein et al., US Patent 6,088,711 ("Fein"). The applicant respectfully traverses the rejection.

As amended, claim 1 recites a method for processing a source document. The formatted text of the document is partitioned into a plurality of groups of words based on positions of the words, font properties of the words, or both. An element is assigned to each of the plurality of groups of words. An element style is derived for the assigned element based on the positions of the words, the font properties of the words, or both. A style sheet defining the element style is created.

Fein discloses a method and system for defining a style for a paragraph after the user creates or edits a paragraph in a document. *See* Fein, column 4, lines 44-46. In Fein's method, a trigger is received, indicating that a user has created or modified a paragraph. *Id.*, column 4, lines 52-58. After the trigger is received, a paragraph type of the created or edited paragraph is identified, and a new style may be defined for and applied to the paragraph, or an existing style applied to the paragraph, based on formatting properties of the paragraph. *Id.*, column 5, lines 6-8; Abstract.

If a set of major formatting properties of the paragraph do not match the major formatting properties of an existing style, or if the paragraph type of the paragraph does not match the paragraph type of the existing style, Fein may define a new style for the paragraph. *Id.*, column 7, lines 31-33. To do so, Fein determines the appropriate style to define for the paragraph, based on the likely function of the paragraph in the document, and, if that style has not been previously defined, Fein creates the new style with the major and minor formatting properties of the paragraph. *Id.*, column 7, lines 45-column 8, line 11.

Fein does not disclose or suggest partitioning the formatted text into a plurality of groups of words based on the positions of the words, the font properties of the words, or both, or assigning a particular element to multiple groups of words, and then deriving an element style for the element based on the properties of the words in those groups of words, both of which claim 1 expressly requires. Instead, Fein partitions his text based on triggers that indicate that a user has created or edited a paragraph, and defines any appropriate new style for the paragraph – based on the properties of just that paragraph – at that time. Because Fein fails to disclose or suggest either (1) partitioning text based on word position and/or font properties, or (2) deriving an element style for an element based on properties of multiple groups of words to which the element is assigned, the applicant submits that no *prima facie* showing of obviousness has been established. Accordingly, the applicant respectfully asserts that claim 1 is allowable over Fein.

Claims 2-20 are dependent claims that are directly or indirectly based on claim 1, and therefore include all of the limitations of that claim. Claim 21 is a computer program product claim that includes limitations analogous to those of claim 1. Claims 22-25 are dependent claims that are directly or indirectly based on claim 21, and therefore include all of the limitations of that claim. The applicant submits that these claims are allowable for at least the reasons discussed above in the context of claim 1.

Claims 16-17 were rejected under 35 U.S.C. 103(a) as being unpatentable over Fein et al., US Patent 6,088,711 in view of Povilus, US Patent 5,740,425. Claims 16-17 have been cancelled, rendering the rejection moot.

## 2. New Claims 26-34

New claims 26-27 are dependent claims that are directly or indirectly based on claim 1, and therefore include all of the limitations of that claim. New claims 28-34 are dependent claims that are directly or indirectly based on claim 21, which includes limitations analogous to those of claim 1, and therefore include all of the limitations of that claim. The applicant submits that these claims are allowable for at least the reasons discussed above in the context of claim 1.

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Page : 11 of 11

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### 3. Conclusion

The applicant submits that all claims are in condition for allowance, and asks that all claims be allowed. Enclosed is a \$442 check for excess claim fees. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 9/18/03



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